

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

CHARLENE RAIFORD,)	
)	
Plaintiff,)	
)	
v.)	
)	CASE NO. 1:12-cv-00548
NORTH CAROLINA CENTRAL)	
UNIVERSITY, through the BOARD)	
OF GOVERNORS OF THE)	
UNIVERSITY OF NORTH)	
CAROLINA and RAYMOND PIERCE,)	
LAUREN COLLINS,)	
and NICHELLE PERRY in their)	
individual capacities.)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS**

COMES NOW, Plaintiff, Ms. Charlene Raiford, by and through undersigned counsel, Melville Johnson, P.C., and files this Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss. This request is made pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 6.1(a), and in support, Plaintiff shows the following.

1. On May 31, 2012, Plaintiff filed her complaint and requested the waiver of service of summons on Defendants on June 19, 2012.

2. Defendants waived service on July 26, 2012. An extension of Defendants' response deadline resulted in the filing of Defendants' Answer and Motion to Dismiss on August 31, 2012.
3. Thereafter, Plaintiff motioned to amend her Complaint on September 24, 2012.
4. On October 8, 2012, Defendants filed a Motion to Dismiss Claims in Plaintiff's Amended Complaint, with an original response deadline set for November 1, 2012.
5. The time prescribed by the Federal Rules of Civil Procedure for the Plaintiff to file a response in the Middle District of North Carolina, has not yet expired.
6. Counsel for Plaintiff has other obligations in federal actions. As a result, counsel for Plaintiff requests an additional fourteen (14) days, up to and including November 15, 2012, to confer with Plaintiff and adequately prepare her response to Defendants' motion.
7. Plaintiff's counsel conferred with counsel for Defendants on October 31, 2012, and counsel for Defendants subsequently expressed her consent to the enlargement of time on November 1, 2012.

WHEREFORE, Plaintiff requests that the Court extend the deadline for serving her response to Defendant's Motion to Dismiss Claims in Plaintiff's Amended Complaint to November 15, 2012.

Respectfully submitted,

/s/ Lee Andrews

Lee Andrews
North Carolina Bar No. 105
P.O Box 21472
Greensboro, NC 274020
Voice 336.378.0524
Email Lee_andrews@bellsouth.net

MELVILLE JOHNSON, P.C.

/s/ Shaun C. Southworth

Shaun Southworth
Missouri Bar No. 62239
22 Seventh Street N.E.
Atlanta, Georgia 30308
Voice 404.724.0000
Facsimile 404.724.0040

22 Seventh Street N.E.
Atlanta, Georgia 30308
Voice 404.724.0000
Facsimile 404.724.0040

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

CHARLENE RAIFORD,)	
)	
Plaintiff,)	
)	
v.)	
)	CASE NO. 1:12-cv-00548
NORTH CAROLINA CENTRAL)	
UNIVERSITY, through the BOARD)	
OF GOVERNORS OF THE)	
UNIVERSITY OF NORTH)	
CAROLINA and RAYMOND PIERCE,)	
LAUREN COLLINS,)	
and NICHELLE PERRY in their)	
individual capacities.)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Plaintiff's Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss was served electronically using the Court's Case Management Electronic Case Filing ("CM/ECF") system.

Respectfully submitted this 1st day of November, 2012.

MELVILLE JOHNSON, P.C.

/s/ Shaun C. Southworth
Shaun C. Southworth
Missouri Bar No.: 62239

22 Seventh St., N.E.

Atlanta, Georgia 30308

Tel: (404) 724-0000

Fax: (404) 724-0040

ssouthworth@melvillejohnson.com